

Section VI. Specific Operating Conditions (continued)

CS. **Emission Unit S2.084** Location North 4,536.1 km, East 555.0 km, UTM (Zone 11)

System 98 – Indoor Air Dust Removal System (Added to Permit on DATE)

S 2.084 Dust Removal System

1. Air Pollution Control Equipment NAC 445B.3405 (NAC 445B.316) *Federally Enforceable Part 70 Program*
Emissions from **S2.084** will be ducted to a control system consisting of a wet scrubber (**WS-205**) with a maximum volume flow rate of 15,000 dry standard cubic feet per minute (dscfm). **WS-205** will be operated in accordance with the manufacturer's recommendations at all times during operation of **S2.084**, including startup and shutdown. The capture efficiency of the control system will be 100% such that all process emissions from **S2.084** will be captured and ducted to **WS-205**.
2. Emission Limits NAC 445B.3405 (NAC 445B.316) *Federally Enforceable Part 70 Program*
 - a. On and after the date of startup of **S2.084**, Permittee will not discharge or cause the discharge into the atmosphere from the exhaust stack of **WS-205**, the following pollutants in excess of the following specified limits:
 - (1) NAC 445B.305 (*Federally Enforceable Part 70 Program*) - The discharge of PM₁₀ (particulate matter less than 10 microns in diameter) to the atmosphere will not exceed **1.93** pounds per hour.
 - (2) NAC 445B.305 (*Federally Enforceable Part 70 Program*) - The discharge of PM (particulate matter) to the atmosphere will not exceed **1.93** pounds per hour.
 - (3) NAC 445B.22017 (*State Only Requirement*) - The opacity from the exhaust stack of **WS-205** will not equal or exceed **20%** in accordance with NAC 445B.22017.
 - (4) NAC 445.721 (*Federally Enforceable SIP Requirement*) - The opacity from the exhaust stack of **WS-205** will not equal or exceed 20% for a period or periods aggregating more than 3 minutes in any 1 hour, in accordance with NAC 445.721.
3. Operating Parameters NAC 445B.3405 (NAC 445B.316) *Federally Enforceable Part 70 Program*
 - a. **S2.084** may operate 8,760 hours per year.
4. Monitoring, Recordkeeping, Reporting and Compliance NAC 445B.3405 (NAC 445B.316) *Federally Enforceable Part 70 Program*
 - a. Within 60 days after achieving the maximum flow rate at which **S2.084** will be operated, but no later than 180 days after initial startup of the facility, Permittee shall determine compliance with the particulate matter and PM₁₀ emission limits established in Section V for **S2.084** by conducting performance tests on the **inlet of the wet scrubber (WS-205)** and on the **exhaust stack of WS-205** as follows:
 - (1) Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine the particulate matter concentration. The sample volume for each test run shall be at least 1.70 dscm (60 dscf). The sampling probe and filter holder of Method 5 may be operated without heaters if the gas stream being sampled is at ambient temperature. For gas streams above ambient temperature, the Method 5 sampling train shall be operated with a probe and filter temperature slightly above the effluent temperature (up to a maximum filter temperature of 121°C (250°F)) in order to prevent water condensation on the filter.
 - (2) A Method 201A test in accordance with 40 CFR Part 51, Appendix M (or an alternative EPA reference method approved by the director for PM₁₀).
 - (3) The Method 201A test required in this section may be replaced by a Method 5 test that includes the back-half catch. All particulate captured in the Method 5 tests with back-half catch performed under this provision shall be considered PM₁₀ emissions for determination of compliance with the emission limitations established in Section V for **S2.084**.
 - (4) For the purposes of demonstrating initial compliance with the opacity standard established in Section V for **S2.084**, opacity observations shall be conducted in accordance with Reference Method 9 in Appendix A of 40 CFR Part 60. Opacity observations shall be conducted within 60 days after achieving the maximum flow rate at which **S2.084** will be operated, but no later than 180 days after initial startup of the facility. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15-second intervals).
 - (5) Performance tests and opacity observations required under this section that are conducted below the maximum allowable flow rate shall be subject to the director's review to determine if the flow rate during the performance tests were sufficient to provide adequate compliance demonstration. Should the director determine that the performance tests do not provide adequate compliance demonstration, the director may require additional performance testing.

Section VI. Specific Operating Conditions (continued)

CS. Emission Unit S2.084 (continued)

4. Monitoring, Recordkeeping, Reporting and Compliance NAC 445B.3405 (NAC 445B.316) *Federally Enforceable Part 70 Program*
 - b. Periodic Compliance Testing
 - (1) Permittee will conduct and record the following periodic compliance tests on the exhaust stack of **WS-205**. **The periodic compliance tests will be conducted on a once every five-year schedule with no more than five years and 90 days between compliance tests.** The compliance tests will consist of three valid runs (except as provided under I.U.5. of this operating permit) and be conducted at the maximum achievable flow rate. The sample volume for each test run shall be at least 1.70 dscm (60 dscf).
 - (i) A Method 201A compliance test in accordance with 40 CFR Part 51, Appendix M (or an alternative EPA reference method approved by the Director) for PM₁₀.
 - (ii) A Method 5 or 17 compliance test in accordance with 40 CFR Part 60, Appendix A (or an alternative EPA reference method approved by the Director) for PM.
 - (2) Permittee may substitute the Method 5 or 17 tests that includes the back-half catch with the Method 201A test.
 - (3) Concurrent with each periodic PM compliance test, conduct and record a Method 9 visible emission test on the exhaust stack of **WS-205** in accordance with 40 CFR Part 60, Appendix A (or an alternative EPA reference method approved by the Director). If visibility or other conditions prevent the opacity observations from being conducted concurrently with the compliance test, then the visible emission test will be rescheduled as soon after the compliance test as practical, but not later than 30 days thereafter.
 - (4) The compliance tests required under 4.b.(1) of this Section will be conducted within 60 days of an alteration or modification. Replacement of equipment with the same type of equipment as part of routine maintenance does not constitute an alteration or modification for the purposes of this requirement, provided that the operating parameters are not altered or modified.
 - c. Monitoring and Recordkeeping
 - (1) Monitor and record the hours of operation of **S2.084** on a daily basis.
 - (2) Install, calibrate, operate and maintain devices for the measurement of the pressure drop and water flow rate through wet scrubber (**WS-205**).
 - (3) Continuously monitor and record the pressure drop and water flow rate through wet scrubber (**WS-205**). Record any monitored occurrences when the pressure drop and water flow rate falls outside the specified operating range and record any corrective actions taken.
 - (4) Conduct and record an assessment of the visible emissions (excluding water vapor) from the exhaust stack of **WS-205** on a weekly basis. If the visible emission survey detects any visible emissions, the Permittee, will conduct and record a Method 9 (or an alternative EPA reference method approved by the Director) visible emissions test within 24 hours. Each visible emissions assessment and Method 9 visible emissions test must be conducted by a certified visible emissions reader in accordance with 40 CFR Part 60, Appendix A, and while **S2.084** is operating. If **S2.084** is shut down for inspection, maintenance, or repairs, the visible emissions assessment described herein will be conducted upon startup. It will be noted in a contemporaneous log if a visual emissions assessment could not be conducted due to **S2.084** not operating or due to poor weather conditions.
 - (5) Maintain records of the specified operating range for the wet scrubber (**WS-205**) on site and available for inspection upon request. The specified operating range will be determined by Permittee based on operating experience and the manufacturer's recommendations.
 - (6) Maintain records of monitoring data, compliance tests and supporting information for a minimum of 5 years following the date of such measurements, reports or records pursuant to Section V.A of this permit. The most recent 2 years will be retained on site and made available for inspection upon request.
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) *Federally Enforceable Part 70 Program*

Compliance with conditions CS.1 through CS.4 of this Section will be deemed compliance with the applicable requirements specified below, as of the issuance date of this operating permit.

Applicable SIP Requirements (Revised as of February 2002):

NAC 445.732 (Industrial Sources) - see streamline analysis provided in Appendix 1 of operating permit renewal application, received February 11, 2005 (case #05AP0202).

NAC Requirements (Revised as of February 2003):

445B.22033 (Sources not Otherwise Limited) - see streamline analysis provided in Appendix 1 of operating permit renewal application, received February 11, 2005 (case #05AP0202).

*******End of Specific Operating Conditions*******

Section X. Amendments

March 9, 2006 - Minor Revision to add System 98. Increase in particulate emissions of 8.45 tpy for both PM and PM-10.

This permit:

- 1. Is non-transferable. (NAC 445B.287.3)**
- 2. Will be posted conspicuously at or near the stationary source. (NAC 445B.318.5)**
- 3. Will expire and be subject to renewal five (5) years after the issuance** February 23, 2006 **.**
date of _____
(NAC 445B.3443.1)
- 4. A complete application for the renewal of a Class I operating permit must be submitted to the director on the form provided by the director with the appropriate fee at least 240 days, but no earlier than 18 months, before the expiration date of the current Class I operating permit for stationary sources. (NAC 445B.3443.2)**
- 5. Any party aggrieved by the Department's decision to issue this permit may appeal to the State Environmental Commission (SEC) within ten days after the date of notice of the Department's action. (NRS 445B.340)**

THIS PERMIT EXPIRES ON: PROPOSED

Signature _____
Issued by: Matthew DeBurle
Supervisor, Permitting Branch
Bureau of Air Pollution Control

Phone: (775) 687-9349 **Date:** March 9, 2006